

UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States of America
v.
1. Paola Astrit Rodriguez (2001/US)
2. Guadalupe Ramirez (1998/US)

Case No. 7:22-mj-1126Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 7, 2022 in the county of Brooks in the
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

21 USC § 841

Possess with Intent to Distribute a Controlled Substance / Approximately 4.38 kilograms of cocaine, a Schedule II Controlled Substance.

21 USC § 846

Conspiracy to Possess with Intent to Distribute a Controlled Substance / Approximately 4.38 kilograms of cocaine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

See Attachment "A"

United States District Court
Southern District of Texas
FILED

JUN 08 2022

Nathan Ochsner, Clerk

☒ Continued on the attached sheet.

Approved by: AUSA Jongwoo Chung

/s/ Nicholas C. Stott

Complainant's signature

Nicholas C. Stott, HSI Special Agent

Printed name and title

Submitted by reliable electronic means, sworn to
and attested to telephonically per Fed. R. Cr. 4.1,
and probable cause found on:

Date: 6/8/2022 7:37 AM*Judge's signature*City and state: McAllen, Texas

U.S. Magistrate Judge Juan F. Alanis

Printed name and title

Attachment "A"

1. On June 7, 2022, Border Patrol Agents (BPAs) encountered Paola Astrit Rodriguez ("RODRIGUEZ"), Guadalupe Ramirez ("RAMIREZ") and RODRIGUEZ's two minor children attempting to cross the Border Patrol checkpoint near Falfurrias, Texas in a vehicle registered to RODRIGUEZ. During the inspection, RODRIGUEZ and RAMIREZ both stated they were traveling from McAllen, Texas to Corpus Christi, Texas to visit the aquarium. BPAs observed RODRIGUEZ to be visibly nervous, giving short answers, and appearing to be in a hurry to depart the checkpoint. RODRIGUEZ was asked for and gave consent for the vehicle to be taken to the X-ray.
2. In secondary inspection, the vehicle was sent through X-ray, where the battery was observed to be abnormal. BPAs conducted a search of the battery area and observed the battery was larger than normal for the vehicle. A further inspection of the battery revealed four tape wrapped packages concealed within the battery, weighing approximately 4.38 kilograms. BPAs field tested the substance inside the packages which was presumptive positive for the properties and characteristics of cocaine.
3. A Homeland Security Investigations (HSI), Special Agent (SA) and Task Force Officer (TFO) from McAllen, Texas responded to the Checkpoint to assist in the investigation.
4. The HSI SA and TFO interviewed RODRIGUEZ, who stated she was hired by an unknown person in the United States to transport what she suspected were drugs from Weslaco, Texas further into the interior of Texas. RODRIGUEZ stated she expected to be paid \$800.00 for the smuggling event. RODRIGUEZ admitted to multiple other drug smuggling events over the past year. RODRIGUEZ stated her children and RAMIREZ were traveling with her to make it appear they were a family, and less susceptible to being apprehended. RODRIGUEZ stated RAMIREZ was aware of the drugs concealed within the battery and had previously accompanied her on at least one drug smuggling event.
5. The HSI SA and TFO interviewed RAMIREZ, who after initially providing false statements about their itinerary and destination, as well as previous trips, admitted to knowing about the drugs concealed within the battery and had previously accompanied RODRIGUEZ on at least one drug smuggling event.